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9 PATRICK CLEMONS

2014 JAN -9 PM 2:01  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES  
DVC

FILED

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

11 PATRICK CLEMONS,  
12 Plaintiff,

14 vs.

15 CREDITOR'S SPECIALTY  
16 SERVICES; and DOES 1 to 10,  
17 inclusive,  
18 Defendants.

Case No.: 5:14-cv-47 VAP-SPx

**COMPLAINT AND DEMAND FOR  
JURY TRIAL**

**(Unlawful Debt Collection Practices)**

**Demand Does Not Exceed \$10,000**

20 **JURISDICTION**

- 21 1. Jurisdiction of this Court arises under 28 U.S.C. § 1331 and pursuant to 15  
22 U.S.C. § 1692k(d), and pursuant to 28 U.S.C. § 1367 for pendent state law  
23 claims.  
24  
25 2. This action arises out of Defendant's violations of the Fair Debt Collection  
26 Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA") and the Rosenthal Fair  
27 Debt Practices Collection Act, §1788.1 et. seq. ("RA").  
28

- 1 3. Venue is proper in this District because the acts and transactions occurred  
2 here, Plaintiff resides here, and Defendants transact business here.

3  
4 **PARTIES**

- 5 4. Plaintiff is a natural person who resides in the City of Yucca Valley, County  
6 of San Bernardino, State of California, and is a “consumer” as that term is  
7 defined by 15 U.S.C. § 1692a(3) and RA §1788(2)(h).  
8

- 9  
10 5. Defendant, Creditors Specialty Services with its office address located at  
11 32023 Crown Valley Road, Acton, California 93510, and is a “debt  
12 collector” as that term is defined by 15 U.S.C. § 1692a(6) and RA  
13 §1788.2(c).  
14

- 15 6. Defendant has a registered agent for service of process by the name of Neal  
16 Evans with an address of 2626 Townsgate, Suite 330, Westlake Village,  
17 California 91361.  
18

19  
20 **FACTUAL ALLEGATIONS**

- 21 7. Defendant was attempting to collect an alleged debt from Plaintiff  
22 concerning past due home owner’s association fees.  
23

- 24 8. On or about March 13, 2013, Defendant filed a lawsuit against Plaintiff in  
25 Los Angeles County.  
26

- 27 9. The lawsuit was improperly filed in Los Angeles County.  
28

- 1 10. Between April 11, 2013 and May 14, 2013, Defendant has continued  
2 attempts to collect the alleged debt from Plaintiff.
- 3 11. Between April 11, 2013 and May 14, 2013, Defendant's agents left 7  
4 messages for Plaintiff in an attempt to collect the debt.
- 5 12. In all seven messages left for Plaintiff by Defendant's agents, none of them  
6 included disclosures that the calls were from a debt collector or that they  
7 were attempting to collect a debt.
- 8 13. In one of the seven messages left for Plaintiff by Defendant's agents,  
9 Defendant's agent made reference to a lien against Plaintiff's home when  
10 no such lien existed.
- 11 14. These communications were in violation of numerous and multiple  
12 provisions of the FDCPA and RA including but not limited to 15 U.S.C. §  
13 1692e(2), 1692e(10), 1692e(11) 1692i(a)(2), and RA §1788.15(a) and  
14 1788.15(b).
- 15 15. Plaintiff has suffered actual damages as a result of this illegal collection  
16 communications by the Defendant in the form of anger, anxiety, emotional  
17 distress, fear, frustration, upset, humiliation, embarrassment, amongst other  
18 negative emotions, as well as suffering from unjustified and abusive  
19 invasions of personal privacy.
- 20  
21  
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28

**TRIAL BY JURY**

16. Plaintiff is entitled to and hereby respectfully demands a trial by jury. US Const. amend. 7. Fed.R.Civ.P. 38.

**CAUSES OF ACTION**

**COUNT I  
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT  
15 U.S.C. § 1692 et seq.**

17. Plaintiff repeats and realleges and incorporates by reference paragraphs 1 through 16.

18. Defendant violated the FDCPA. Defendants violations include, but are not limited to, the following:

(a) The Defendants violated 15 U.S.C. §1692e(2) by representing or implying that nonpayment of any debt will result in the arrest or imprisonment of any person or the seizure, garnishment, attachment, or sale of any property or wages of any person unless such action is lawful and the debt collector or creditor intends to take such action.

(b) The Defendants violated 15 U.S.C. §1692e(10) by using any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

1 (c) The Defendants violated 15 U.S.C. §1692e(11) by failing to  
2 communicate the mini-Miranda warning, "This is an attempt to  
3 collect a debt ... communication is from a debt collector."

4 (d) The Defendants violated 15 U.S.C. §1692i(a)(2) by bringing any  
5 legal action in a location other than where the contract was signed  
6 or where the consumer resides.  
7

8  
9 19. As a result of each and every Defendant's violations of the FDCPA,  
10 Plaintiff is therefore entitled to actual damages pursuant to 15 U.S.C. §  
11 1692k(a)(1); statutory damages in an amount up to \$1,000.00 pursuant to  
12 15 U.S.C. § 1692k(a)(2)(A); and, reasonable attorney's fees and costs  
13 pursuant to 15 U.S.C. § 1692k(a)(3) from each and every Defendant herein.  
14

15 **WHEREFORE**, Plaintiff respectfully prays that judgment be entered  
16 against Defendant as follows:  
17

- 18  
19 a) For an award of actual damages pursuant to 15 U.S.C. §1692k(a)(1)  
20 against Defendant and in favor of Plaintiff;  
21  
22 b) For an award of statutory damages of \$1,000.00 pursuant to 15 U.S.C.  
23 §1692k(a)(2)(A) against Defendant in favor of Plaintiff; and  
24  
25 c) For an award of costs of litigation and reasonable attorney's fees pursuant  
26 to 15 U.S.C. §1692k(a)(3) against Defendant and in favor of Plaintiff; and  
27  
28

1 d) Actual damages from the Defendants for all damages including emotional  
2 distress suffered as a result of the intentional, reckless, and/or negligent  
3 FDCPA violations.  
4

5  
6 **COUNT II**  
7 **VIOLATIONS OF THE ROSENTHAL FAIR DEBT COLLECTION**  
8 **PRACTICES ACT §1788 et seq.**  
9

10 20. Plaintiff repeats and realleges and incorporates by reference paragraphs 1  
11 through 11.

12 21. Defendant violated the RFDCPA. Defendants violations include, but are  
13 not limited to, the following:  
14

15 (a) The Defendants violated §1788.15(a) by collecting or attempting  
16 to collect a consumer debt by means of judicial proceedings when  
17 the debt collector knows that service of process, where essential to  
18 jurisdiction over the debtor or his property, has not been legally  
19 effected.  
20

21  
22 (b) The Defendant violated §1788.15(b) by collecting or attempting to  
23 collect a consumer debt, other than one reduced to judgment, by  
24 means of judicial proceedings in a county other than the county in  
25 which the debtor has incurred the consumer debt or the county in  
26 which the debtor resides at the time such proceedings are  
27  
28

1 instituted, or resided at the time the debt was incurred.

2 22. As a result of Defendant's violations of the RFDCPA, Plaintiff is  
3 entitled to any actual damages pursuant to California Civil Code §  
4 1788.30(a); statutory damages for a knowing or willful violation in the  
5 amount up to \$1,000.00 pursuant to California Civil Code § 1788.30(b); and  
6 reasonable attorney's fees and costs pursuant to California Civil Code §  
7 1788.30(c) from Defendant.  
8  
9

10 **WHEREFORE**, Plaintiff respectfully prays that judgment be entered  
11 against Defendant as follows:  
12

- 13 a) For an award of actual damages from each and every Defendant pursuant  
14 to California Civil Code §1788.30(a);  
15  
16 b) For an award of statutory damages up to \$1,000.00 pursuant to California  
17 Civil Code § 1788.30(b); and  
18  
19 c) For an award of litigation costs and reasonable attorney's fees pursuant to  
20 California Civil Code § 1788.30(c) against each and every Defendant.  
21

22 **RESPECTFULLY SUBMITTED,**

23 **DATED:** December 31, 2013

24 **PRICE LAW GROUP APC**

25  
26 By: 

27 G. Thomas Martin, III  
28 Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Virginia A. Phillips and the assigned Magistrate Judge is Sheri Pym.

The case number on all documents filed with the Court should read as follows:

5:14-cv-00047 VAP-SPx

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

January 9, 2014

Date

By SBOURGEOIS

Deputy Clerk

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NOTICE TO COUNSEL

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

**Subsequent documents must be filed at the following location:**

☐ Western Division  
312 N. Spring Street, G-8  
Los Angeles, CA 90012

☐ Southern Division  
411 West Fourth St., Ste 1053  
Santa Ana, CA 92701

☒ Eastern Division  
3470 Twelfth Street, Room 134  
Riverside, CA 92501

**Failure to file at the proper location will result in your documents being returned to you.**



**I. (a) PLAINTIFFS** ( Check box if you are representing yourself ☐ )

PATRICK CLEMONS

**DEFENDANTS** ( Check box if you are representing yourself ☐ )

CREDITOR'S SPECIALTY SERVICES; and DOES 1 to 10, inclusive,

**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.)G. Thomas Martin, III (SBN 218456)  
PRICE LAW GROUP, APC, (818)907-2030  
15760 Ventura Blvd., Suite 1100, Encino, CA 91436**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.)**II. BASIS OF JURISDICTION** (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff
- ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant
- ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**-For Diversity Cases Only  
(Place an X in one box for plaintiff and one for defendant)

- |   |                                |                                |   |                                |                                |
|---|--------------------------------|--------------------------------|---|--------------------------------|--------------------------------|
| Citizen of This State                   | PTF <input type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State     | PTF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2     | <input type="checkbox"/> 2     | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5     | <input type="checkbox"/> 5     |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3     | <input type="checkbox"/> 3     | Foreign Nation  | <input type="checkbox"/> 6     | <input type="checkbox"/> 6     |

**IV. ORIGIN** (Place an X in one box only.)

- ☒ 1. Original Proceeding
- ☐ 2. Removed from State Court
- ☐ 3. Remanded from Appellate Court
- ☐ 4. Reinstated or Reopened
- ☐ 5. Transferred from Another District (Specify)
- ☐ 6. Multi-District Litigation

**V. REQUESTED IN COMPLAINT: JURY DEMAND:** ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)**CLASS ACTION under F.R.Cv.P. 23:** ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ according to proof**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	<b>Habeas Corpus:</b>	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b>	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	<b>PERSONAL PROPERTY</b>	<b>PERSONAL PROPERTY</b>	<input type="checkbox"/> 530 General	<b>SOCIAL SECURITY</b>
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<b>Other:</b>	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input checked="" type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 340 Marine	<b>BANKRUPTCY</b>	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<b>FORFEITURE/PENALTY</b>	<b>FEDERAL TAX SUITS</b>
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<b>CIVIL RIGHTS</b>	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	<b>REAL PROPERTY</b>	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	<b>LABOR</b>	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 751 Family and Medical Leave Act	
		<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

**FOR OFFICE USE ONLY:**

Case Number:

5:14-cv-47

## CIVIL COVER SHEET

**VIII. VENUE:** Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court?	STATE CASE WAS PENDING IN THE COUNTY OF:	INITIAL DIVISION IN CACD IS:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Los Angeles	Western
If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action?	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF?	A DEFENDANT?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Then check the box below for the county in which the majority of DEFENDANTS reside.	Then check the box below for the county in which the majority of PLAINTIFFS reside.	
If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims?	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>C.1. Is either of the following true? If so, check the one that applies:</b> <input type="checkbox"/> 2 or more answers in Column C <input type="checkbox"/> only 1 answer in Column C and no answers in Column D  Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below. If none applies, answer question C2 to the right. →	<b>C.2. Is either of the following true? If so, check the one that applies:</b> <input checked="" type="checkbox"/> 2 or more answers in Column D <input type="checkbox"/> only 1 answer in Column D and no answers in Column C  Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below. If none applies, go to the box below. ↓
Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.	

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	EASTERN DIVISION

## CIVIL COVER SHEET

**IX(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): \_\_\_\_\_

**IX(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**X. SIGNATURE OF ATTORNEY**

**(OR SELF-REPRESENTED LITIGANT):** \_\_\_\_\_

*J. Thomas Nelson*

DATE: 12/31/2013

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))